



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
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May 8, 2020

*Via ECF*

Hon. Robert M. Levy  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York

Re: **SEC v. Saltsman, et al. 07 Civ. 4370 (NGG)(RML)**

Dear Judge Levy:

Plaintiff provides the following status report on behalf of it and Defendant Andrew Brown, the remaining parties in this action. As described in the prior joint status report dated September 27, 2019, the parties were unable to agree to a stipulation concerning certain contested facts for the motion the Commission will be filing to set the monetary amount that Mr. Brown should pay. It is Mr. Brown's position that he should not have to pay any financial penalty. Consequently, the parties agreed that a potential solution would be for Mr. Brown to move the Court in the criminal action against him for a limited unsealing of certain sentencing documents, which contained relevant materials for the Commission's motion. That unopposed motion was filed in September, but is still pending. The parties, therefore, continue to request that the Court allow the parties to file a status update, including a briefing schedule, within thirty days after receiving a decision from the court in the criminal action regarding the motion for limited unsealing.

Respectfully submitted,

/s/ Todd D. Brody  
Todd D. Brody  
Senior Trial Counsel

cc: Jerry Bernstein, Rither Alabre (via email)